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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE PG&E CORPORATION, PACIFIC  
GAS AND ELECTRIC COMPANY,

Reorganized Debtors,

- ☒ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)  
(Jointly Administered)

**JOINDER OF STICHTING PENSIOENFONDS ABP AND STICHTING DEPOSITARY  
APG DEVELOPED MARKETS EQUITY POOL IN LEAD PLAINTIFF PERA AND  
THE SECURITIES ACT PLAINTIFFS' RESPONSE AND OPPOSITION TO THE  
REORGANIZED DEBTORS' THIRTY-THIRD SECURITIES OMNIBUS CLAIMS  
OBJECTION**

1 Stichting Pensioenfonds ABP and Stichting Depository APG Developed Markets Equity  
2 Pool (collectively, “APG”) hereby submit this joinder (the “Joinder”) in Lead Plaintiff PERA and  
3 the Securities Act Plaintiffs’ Response and Opposition to the Reorganized Debtors’ Thirty-Third  
4 Securities Omnibus Claims Objection (ECF No. 14342) (the “Opposition”). In support hereof,  
5 APG states as follows:

### 6 **BACKGROUND**

7 1. APG is a Securities Claimant that timely filed a proof of claim against PG&E  
8 Corporation (“PG&E”) in accordance with the Extended Bar Date Order. Specifically, on April  
9 15, 2020, APG filed Claim No. 101997 against PG&E; on May 8, 2020, APG filed an amended  
10 proof of claim against PG&E (No. 104186); and on October 13, 2023, APG filed an amendment  
11 to proof of claim No. 104186 against PG&E adopting the relevant allegations in the Third  
12 Amended Consolidated Class Action Complaint for the Violation of the Federal Securities Laws  
13 (ECF No. 121) filed in *In re PG&E Corp. Sec. Litig.*, No. 3:18-cv-03509 (N.D. Cal.) (the “PERA  
14 Complaint”), specifically those allegations describing conduct by the defendants named in the  
15 PERA Complaint and the causes of action asserted in the PERA Complaint.

16 2. On December 13, 2023, the Debtors filed the 33rd Omnibus Claim Objection (the  
17 “Objection”) [Dkt. No. 14200], which seeks dismissal of the claims filed by numerous Securities  
18 Claimants including APG.

19 3. The factual and legal elements of Securities Claimants’ claims, such as the falsity  
20 of Debtors’ statements, the scienter of Debtors and their officers in making those statements,  
21 whether Debtors’ false statements caused the Securities Claimants’ damages, and the amount of  
22 damages per share of PG&E common stock, are common to all Securities Claimants.

### 23 **JOINDER**

24 4. For the foregoing reasons and the reasons set forth in the Opposition, APG hereby  
25 joins in all of the arguments contained in the Opposition in all respects, and adopts and incorporates  
26 them herein by reference.

### 27 **CONCLUSION**

28 5. For the reasons set forth herein and in the Opposition, APG joins in the Opposition

1 and asks that this Court enter an Order denying the Objection.

2 Dated: March 15, 2024

Respectfully submitted,

3 **BERNSTEIN LITOWITZ BERGER**  
4 **& GROSSMANN LLP**

5 By: /s/ Jonathan D. Uslaner

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